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October 23, 2008

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: Developing a Unified Intercarrier Compensation Regime, CC
Docket No. 01-92; High-Cost Universal Service Support, WC
Docket No. 05-337; Universal Service Contribution
Mechanism, WC Docket No. 06-122; Intercarrier
Compensation for ISP-Bound Traffic, WC Docket No. 99-68;
IP-Enabled Services, WC Docket No. 04-36**

Dear Ms. Dortch:

On October 22, 2008, Kathryn Zachem, Susan Jin Davis, and the undersigned of Comcast Corporation (Comcast) and Gina Keeney of Lawler, Metzger, Milkman & Keeney, LLC, outside counsel to Comcast, met separately with Scott Deutchman, Legal Advisor to Commissioner Adelstein and Greg Orlando, Legal Advisor to Commission Tate, to discuss issues pending before the Commission in the above-captioned proceedings. Earlier today, the same Comcast representatives met with Nick Alexander, Legal Advisor to Commissioner McDowell. During these discussions, Comcast representatives emphasized that transitioning termination rates to cost-based levels over no longer than a three-year period would be in the public interest. Comcast's representatives also stressed that the Commission's existing interconnection rules have been working well and need not and should not be modified at this time. Comcast's representatives explained the importance of transit service to the company's ability to offer ubiquitous termination to its voice consumers. Finally, Comcast's representatives urged the Commission to impose a cap on the overall size of the high-cost fund.

In accordance with section 1.1206 of the Commission's rules, this letter is being electronically filed in the above-captioned proceedings. If you have any questions, please contact me.

Respectfully submitted,



Mary McManus

cc: Scott Deutchman
Greg Orlando
Nick Alexander